

3. In related cases, Defendant Alanus has filed similar Motions to Dismiss and has agreed to similar extensions of time for other Plaintiffs to respond.

4. On January 14, 2013, at a Status Conference on this and related cases, the Court has entered a stay on all discovery in this matter until February 15, 2013 in anticipation of the ruling of the Joint Panel on Multi-District Litigation.

5. Allowance of this Motion will not have a substantial impact upon the progress of this case and is in the best interest of justice.

WHEREFORE, Plaintiffs respectfully request that the Court extend the time for the Plaintiffs to respond to Defendant Alanus' Motion to Dismiss up to and including January 25, 2013.

RESPECTFULLY SUBMITTED:

SHEFF LAW OFFICES, P.C.

/s/ Frank J. Federico, Jr.
Douglas K. Sheff, BBO # 544072
dsheff@shefflaw.com
Donald R. Grady, Jr. BBO #544841
dgrady@shefflaw.com
Frank J. Federico, Jr. BBO # 550193
ffederico@shefflaw.com
Joseph N. Magner, BBO # 678599

imagner@shefflaw.com

10 Tremont Street, 7th Fl.

Boston, MA 02108

Tel: 617-227-7000

Fax: 617-227-8833

AND

Law Offices of K. William Kyros

K. William Kyros, BBO# 634442

kon@kyroslaw.com

17 Miles Road

Hingham, MA 02043

Tel: 1-800-934-2921

Certificate of Service

I, Frank J. Federico, Jr., hereby certify that I served a copy of the foregoing document upon all counsel of record by causing a copy to be sent to them via the Electronic Filing System this 15th day of January, 2013.

/s/ Frank J. Federico, Jr.

Frank J. Federico, Jr.